

WILLIAM V. JOHNSON
JOHN W. BELL
JACK T. RILEY, JR.
BRIAN C. FETZER
THOMAS H. FEGAN
DONALD H. HOPPE
THOMAS V. MURPHY
PAMELA L. GELLEN
THOMAS J. ANDREWS
WILLIAM G. BEATTY
JOHN A. CHILDERS
ROBERT L. NORA
MARGARET A. UNGER
TIMOTHY J. MCKAY
EDWARD M. RUBIN
PAUL J. WISNER
H. PATRICK MORRIS
ROBERT A. TOWNSEND
SCOTT W. HOYNE
JAMES S. STICKLES, JR.
FREDERICK S. MUELLER
JOSEPH R. MARCONI
FREDERICK H. BRANDING
CORNELIUS J. HARRINGTON III
THOMAS MURPHY
MICHAEL B. GUNZBURG
CHARLES W. PLANEK
ROBERT M. BURKE
EDWARD D. D'ARCY, JR.
DEBRA A. DIMAGGIO
MICHAEL P. SIAVELIS
WILLIAM A. GEISER
THOMAS J. KOCH
KURT C. MEIHOFFER
KEVIN G. OWENS
STEVEN I. RAPAPORT

JOHNSON & BELL, LTD.

ATTORNEYS AT LAW
SUITE 2200
222 NORTH LA SALLE STREET
CHICAGO, ILLINOIS 60601

TELEPHONE (312) 372-0770
FACSIMILE (312) 372-9818

SUITE 1640
2100 MANCHESTER ROAD
WHEATON, ILLINOIS 60187
TELEPHONE (708) 510-0880
FACSIMILE (708) 510-0939

WRITER'S DIRECT DIAL NUMBER

July 10, 1992

00041
WILLIAM J. ARAYA
DEAN M. ATHANS
LEO G. AUBEL
GREGORY R. BART
FRANK S. CAPUANI
TERRENCE S. CARDEN
NANCY K. CARON
ROBERT J. COMFORT
GREGORY D. CONFORTI
LARRY A. CRUTSER
DENNIS C. CUSACK
JEFFREY W. DEER
DANIEL A. DUPRE
NANCY G. ENDERBY
LAURA B. GLASER
ALAN JAY GOLDSTEIN
KEVIN J. GREENWOOD
SUSAN MARZEC HANNIGAN
JAMES P. JOHNSTON
JANET A. KACHOYEANOS
ANDREA H. KOTT
GENEVIE F. LABUOA
BRUCE M. LICHTCSIEN
KATHRYN K. LOFT
THOMAS J. LYMAN, III
EMILIO E. MACHADO
DAVID M. MACKSEY
ROBERT J. MALMROSE
DANIEL C. MURRAY
BRIAN P. O'NEILL
KARYN L. ORDOWER
RICHARD C. PERRA
THOMAS F. POELKING
CHARLES P. RANTIS
MARILYN MCCABE REIDY
RICHARD J. ROSENBLUM
ANN M. SMITH
ROBERT SPITKOVSKY, JR.
VINCENT J. STARK
TERRY A. TAKASH
PAUL A. TANZILLO
GERALD T. TSCHURA
STEVEN F. WITTMAN

VIA CERTIFIED AND REGULAR MAIL
CERTIFIED MAIL NO. P 396 655 832

Office of Waste Programs Enforcement (OS-510)
United States Environmental
Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Attention: Fred Zimmerman

Re: In the Matter of CIW Site, Romulus, Michigan
Employers Insurance of Wausau
Petition for Reimbursement of Costs
Under 42 U.S.C. Section 9606(b)(2)

Dear Mr. Zimmerman:

As you know, our letters of June 18, 1992 to USEPA Headquarters and June 25, 1992 to USEPA Region V requested additional information and documentation in order for Employers Insurance of Wausau (Wausau) to provide comments responsive to the USEPA's "preliminary decision" of June 2, 1992. We respectfully requested this information within ten (10) days but, to date have received no written response from the USEPA.

You have informed us, however, that certain information and documents will be provided to us, and we have no objection if same could be provided to us by a date certain of July 27, 1992, or the Monday following thirty (30) days from our June 25, 1992 letter.

Also, and in order for Wausau to provide comments to the USEPA's "preliminary decision" we further respectfully request at this time that the USEPA, as Respondent, provide Wausau with answers to each paragraph of Wausau's Petition for Reimbursement

JOHNSON & BELL, LTD.

Mr. Zimmerman
July 10, 1992
Page 2

that clearly and directly admit, deny or explain each of the allegations contained in the Petition for Reimbursement. In this respect, we respectfully request the USEPA's answers by the same July 27, 1992 date referred to above.

At this time, we also reiterate our prior requests wherein Wausau respectfully requested an extension of time for an additional thirty (30) days from the date USEPA Headquarters and/or USEPA Region V provides us with copies of the information and documents identified in our June 18, 1992 and June 25, 1992 letters. Using the July 27, 1992 date referenced above as a target date, the thirty (30) day extension would be until August 27, 1992.

Finally, please allow this letter to acknowledge receipt of the USEPA's July 2, 1992 letter and to respectfully request that this correspondence be made part of the USEPA's Administrative Record. Thank you.

Very truly yours,

JOHNSON & BELL, LTD.

A handwritten signature in dark ink, appearing to read 'Frederick S. Mueller', written over the typed name.

Frederick S. Mueller

FSM:ps
w/encl.

cc: Brett L. Warning/USEPA